

767 Fifth Avenue  
New York, NY 10153-0119  
+1 212 310 8000 tel  
+1 212 310 8007 fax

Matthew P. Goren  
+1 (212) 310-8440  
[matthew.goren@weil.com](mailto:matthew.goren@weil.com)

September 6, 2022

**Via Email and ECF**

Honorable Martin Glenn  
Chief United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Courtroom 523  
New York, NY 10004-1408

***Re: In re All Year Holdings Limited, Chapter 11 Case No. 21-12051 (MG)***  
***Zelig Weiss v. All Year Holdings Limited, Adv. Proc. No. 22-1115 (MG)***

Dear Chief Judge Glenn:

We represent All Year Holdings Limited, as debtor and debtor in possession (the “**Debtor**” and, together with YG WV LLC and Wythe Berry Member LLC, the “**Defendants**” in the above-referenced adversary proceeding (the “**Adversary Proceeding**”)) in the above-referenced chapter 11 case (the “**Chapter 11 Case**”). As discussed on the record before the Court at the case management conference held on September 1, 2022, the Debtor has conferred with counsel for each of Paragraph Partners LLC (the “**Sponsor**”), Mishmeret Trust Company Ltd., Mr. Zelig Weiss (“**Plaintiff**”), and Mr. Yoel Goldman regarding each party’s willingness to engage in mediation regarding the outstanding disputes between and among the parties that impact the Debtor’s proposed chapter 11 plan. The Debtor is pleased to report that the parties have unanimously agreed to submit to mediation of their respective issues.

The Debtor has proposed the following schedule in connection with the mediation process, subject to agreement by the mediator and comment from the other parties:

| Event   | Deadline           |
|---|--------------------|
| Deadline to select mediator or schedule a conference with the Court to appoint a mediator for the parties | September 9, 2022  |
| Deadline for parties to agree on key documents to be provided to mediator                                 | September 12, 2022 |

|   |  |
|---|--|
| Deadline for Sponsor to submit position statement on the status of the MLPSA and its treatment under the Debtor's proposed chapter 11 plan (optional for other parties to submit mediations statements) | September 12, 2022                         |
| Deadline to complete mediator preparation   | September 16, 2022                         |
| Mediation sessions (subject to mediator's and the parties' availability)  | September 19, 2022 –<br>September 23, 2022 |

As discussed on the record at the September 1, 2022 case conference, the parties' agreement to participate in mediation will not impact, alter, or delay the current schedule with respect to the Adversary Proceeding or plan confirmation. The Plaintiff and Defendants, however, request that the Court hold in abeyance any ruling concerning the pending motions to be heard at the September 13, 2022 hearing in the Adversary Proceeding until the Plaintiff or Defendants notifies the Court that the mediation has concluded without a settlement of their dispute.

We are available should the Court have any questions or wish to discuss these matters further.

Respectfully submitted,

/s/ Matthew P. Goren  
Matthew P. Goren